

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al.,	§	
Plaintiffs,	§	CIVIL ACTION NO.
	§	
v.	§	5:21-CV-0844-XR
	§	
STATE OF TEXAS, et al.,	§	[Consolidated Action: Lead Case]
Defendants.	§	

**DEFENDANTS JACQUELYN F. CALLANEN AND JOE D. GONZALES'S
RULE 26(a)(3) PRE-TRIAL DISCLOSURES**

TO THE HONORABLE COURT:

Defendants Jacquelyn F. Callanen and Joe D. Gonzales (“Bexar County Defendants”) pursuant to the Second Amended Scheduling Order entered on March 30, 2023 (ECF No. 579), and Rule 26(a)(3) of the Federal Rules of Civil Procedure, make their pre-trial disclosures. The Bexar County Defendants reserve the right to amend their disclosures to include witnesses or exhibits that they could not have reasonably anticipated to be necessary, or to respond to amendments to the other parties’ disclosures made under Rules 26(a)(3)(A)(i)-(iii).

A. WITNESSES (Rule 26(a)(3)(A)(i))

Witnesses the Bexar County Defendants expect to present:

None.

Witnesses the Bexar County Defendants will call if the need arises:

None.

B. DESIGNATIONS OF DEPOSITION TESTIMONY (Rule 26(a)(3)(A)(ii))

None. However, the Bexar County Defendants reserve the right to offer portions of the deposition of any witness that the opposing parties may designate pursuant to Rule

26(a)(3)(A)(ii). See Fed. R. Civ. P. 32(a)(6).

C. DOCUMENTS AND OTHER EXHIBITS (Rule 26(a)(3)(A)(iii))

Documents and other exhibits the Bexar County Defendants expect to offer:

None.

Documents and other exhibits the Bexar County Defendants will offer if the need arises:

None.

Respectfully submitted,

JOE D. GONZALES
Bexar County Criminal District Attorney

By: /s/ Lisa V. Cubriel
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically on July 28, 2023, with the clerk of court for the U.S. District Court, Western District of Texas, by using the CM/ECF system, causing electronic service upon all counsel of record.

By: /s/ Lisa V. Cubriel
LISA V. CUBRIEL